

# EXHIBIT A

## Mary Grace White

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**From:** Mary Grace White  
**Sent:** Tuesday, May 30, 2017 2:49 PM  
**To:** 'Schechter, Jody E.'; Brian Neville  
**Cc:** 'jfkeenan@joekeenanlaw.com'; Hunt, Dean D.; Smith, Rachel M.; Steven Davis; Robert Miller  
**Subject:** RE: APN 10-05048, Picard . Armand L. Greenhall, et al. - Amended Case Management Notice

Jody,

I hope you had a nice holiday weekend. I am so sorry for the delay; the end of last week ended up being much busier than expected.

We agree to staying discovery for a 3 month period in order to engage in early mediation and to extending discovery for an additional 3 month period following the mediator's failed mediation report. We have had success mediating several of our other clawback cases and we think this case in particular would be well suited for mediation. Please send us a list of proposed mediators and dates on which you expect to be available. (We have a number of hearings this summer and anticipate being more available towards the end of the 3 month time frame.) We can then set up a call to discuss mediators.

Please give me a call if you have any other questions or concerns.

Thanks,

Mary-Grace White  
Lax & Neville LLP



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**From:** Schechter, Jody E. [mailto:[jschechter@bakerlaw.com](mailto:jschechter@bakerlaw.com)]  
**Sent:** Friday, May 26, 2017 5:00 PM  
**To:** Brian Neville; Mary Grace White

**Cc:** 'jfkeenan@joekeenanlaw.com'; Hunt, Dean D.; Smith, Rachel M.; Steven Davis; Robert Miller  
**Subject:** RE: APN 10-05048, Picard . Armand L. Greenhall, et al. - Amended Case Management Notice

Brian and Mary Grace,

I spoke with Mary Grace on Wednesday regarding this matter, and was expecting to hear back yesterday. We have not heard back. Our request for an extension has now been outstanding for a week, and discovery is set to close on June 5.

In light of my conversation with Mary Grace, we have an alternate proposal. We propose staying discovery for a 3-month period in order to engage in early mediation. If we do not settle, we propose extending discovery for an additional 3-month period following the mediator's failed mediation report.

Please let us know if you agree no later than Tuesday of next week, May 30.

Thanks,  
Jody

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**From:** Brian Neville [<mailto:bneville@laxneville.com>]  
**Sent:** Tuesday, May 23, 2017 6:21 PM  
**To:** Schechter, Jody E.; Robert Miller; 'jfkeenan@joekeenanlaw.com'  
**Cc:** Hunt, Dean D.; Smith, Rachel M.; Mary Grace White; Steven Davis  
**Subject:** RE: APN 10-05048, Picard . Armand L. Greenhall, et al. - Amended Case Management Notice

Jody,

Sorry for the delayed response. Can we set a call to discuss the case? I am having a tough time with the idea that when we want to extend discovery we are generally told that the June 5<sup>th</sup> date cannot be moved. But when counsel for the Trustee wants to move it, there seems to be an expectation that it is as simple as asking and a Stip is filed.

Brian J. Neville  
Lax & Neville LLP



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